

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**W&T OFFSHORE, INC.****V.****HAT CREEK ENERGY, LLC  
and HALLIBURTON ENERGY  
SERVICES, INC.**

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**Civil Action No. 4:17-cv-00097****AFFIDAVIT OF BRETT SMITH**

THE STATE OF TEXAS §  
§  
COUNTY OF HARRIS §

BEFORE ME, the undersigned authority, on this day personally appeared BRETT SMITH, who, after being duly sworn, deposed as follows:

1. My name is Brett Smith. I am a Senior Staff Landman at W&T Offshore, Inc. ("W&T"), the Plaintiff in this case. I am over the age of 18 years and in all respects qualified to make this affidavit. I am duly qualified and authorized to make this affidavit on behalf of W&T. By virtue of my position with W&T, I have personal knowledge of the facts in this affidavit and they are true and correct.
2. W&T is the operator of the Vermilion Block 225 ("Block 225") and Vermilion Block 226 ("Block 226")(collectively referred to as the "Blocks"), Offshore Louisiana. Below is a list of the platforms and their associated wells:

Block 225 B Platform	Block 226 A Platform
Block 225 B-1 Well	Block 226 A-1 Well
Block 225 B-2 Well	Block 226 A-2 Well
Block 225 B-3 Well	Block 226 A-3 Well
Block 225 B-4 Well	Block 225 A-4 Well
Block 225 B-5 Well	Block 225 A-5 Well
Block 225 B-7 Well	Block 226 A-6 Well
	Block 226 A-7 Well
	Block 225 A-8 Well
	Block 226 A-9 Well
	Block 225 A-10 Well
	Block 226 A-11 Well
	Block 226 A-12 Well

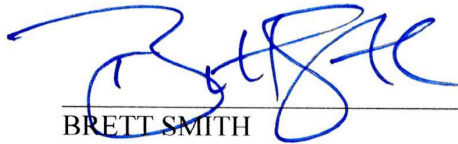
**Exhibit C**

The Block 225 B-7 Well was formerly known as the Block 225 B-10 Well. Attached hereto as Exhibit 1 is a true and correct copy of the Offshore Operating Agreement for the Blocks. Halliburton owned a 6.93056% share of the Blocks.

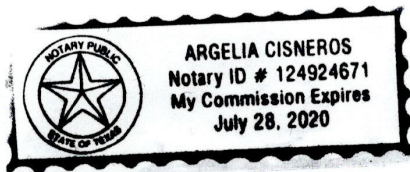
3. In June of 2012, Halliburton and Hat Creek executed an assignment whereby Halliburton assigned its interests in the Blocks to Hat Creek. That assignment had an effective date prior to 2012. Following receipt of notice of the assignment from Halliburton to Hat Creek, W&T began submitting invoices relating to the Blocks to Hat Creek. Hat Creek notified W&T that it was disputing ownership of certain wells.
4. Hat Creek claims that Halliburton did not assign to Hat Creek an interest in all the above-listed wells and platforms. Further, at one point, Hat Creek claimed that Halliburton could not have assigned its interest Wells A-1, A-2, A-3, A-5, A-6, A-7, B-1, and B-3 and the A and B Platforms because there was no documentation that Halliburton owned an interest in those particular wells and platforms. Attached hereto as Exhibit 2 are true and correct copies of Authority for Expenditures ("AFE") presented and approved by Halliburton relating to Wells A-1, A-2, A-3, A-5, A-6, A-7, and B-1, and the A and B Platforms.

FURTHER AFFIANT SAYETH NOT.

EXECUTED this 29<sup>th</sup> day of March 2017.

  
BRETT SMITH

SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned authority, by Brett Smith, on this the 29<sup>th</sup> day of March 2017 to certify which witness my hand and seal.



  
NOTARY PUBLIC, STATE OF TEXAS